



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

MAR 07 2017

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

MAR 3 2017

Mr. Joseph A. Cocciardi  
Cocciardi and Associates, Inc.  
4 Kacey Court  
Mechanicsburg, PA 17055-5596

RE: **PCB Remediation at the Scranton Lace Complex, 1313 Meylert Avenue, Scranton,  
PA - # 2017-61-002**

Dear Mr. Cocciardi:

This letter is in response to Lace Building Affiliates, LP (Lace Building Affiliates) notification and certification, dated January 30, 2017, and an amendment dated February 13, 2017, provided to the U.S. Environmental Protection Agency Region III (EPA) pursuant to the requirements of the *Self-implementing on-site cleanup and disposal of PCB remediation waste* regulation, 40 C.F.R. § 761.61(a). This notification and certification and the amendment was received by EPA on February 8 and 13, 2017, respectively. This notification and certification was submitted by Joseph Cocciardi, Cocciardi and Associates, Inc., on behalf of Lace Building Affiliates regarding Lace Building Affiliates' plan to clean up and dispose of polychlorinated biphenyl (PCB) waste located at the Scranton Lace Complex in Scranton, Pennsylvania.

EPA has reviewed Lace Building Affiliates' cleanup plan for the Scranton Lace Complex and finds that it is consistent with the requirements of 40 C.F.R. § 761.61(a). An alternate characterization sampling was used for Building 8-10 and was determined to be reasonable for purposes of identifying PCB-contaminated materials for off-site disposal and for confirming that PCB cleanup standards have been met. EPA finds that the alternate characterization sampling approach used for Building 8-10 creates no unreasonable risk when conducted under the PCB regulations and the conditions of this Approval. EPA approves the alternate characterization sampling for Building 8-10 under 40 C.F.R. § 761.61(c).

EPA hereby approves the PCB cleanup plan for the Scranton Lace Complex submitted with Lace Building Affiliates' notification and certification, dated January 30, 2017 and February 13, 2017. This approval is subject to the conditions and limitations set forth in 40 C.F.R. § 761.61(a). The approved plan may be modified only in accordance with the procedures described at 40 C.F.R. § 761.61(a)(3)(ii).

EPA notes that within sixty (60) days of completion of the cleanup activities the owner of the property shall submit to the Director of the Land and Chemicals Division of EPA Region III a copy of the deed with the notation and a certification, signed by the owner of the property,

stating that he/she has recorded a notation in the deed to the property. As specified in 40 C.F.R. § 761.61(a)(8)(i)(A)(1) and (3), the notation should indicate the cleanup level left at the Clock Tower and that the Clock Tower is restricted to use as low occupancy area as defined in 40 C.F.R. § 761.3.

EPA's approval of Lace Building Affiliates' plan does not in any way constitute a finding by EPA that the Scranton Lace Complex, located at 1313 Meylert Avenue, Scranton, will be safe or appropriate for any future use, does not insulate the owner or occupant of the property from action under any applicable law, and does not relieve Lace Building Affiliates, or any other owner or operator of the Scranton Lace Complex of its continuing responsibility to comply fully with 40 C.F.R. Part 761. EPA emphasizes that these regulations include several conditions and limitations that apply to persons performing a PCB cleanup activity subject to 40 C.F.R. § 761.61(a). Among other things, the regulations state that "[c]omplete compliance with 40 C.F.R. § 761.61 does not create a presumption against enforcement action for penalties for any unauthorized PCB disposal," 40 C.F.R. § 761.50(b)(3)(ii)(B). Further, "[a]ny person storing or disposing of PCBs is also responsible for determining and complying with all other applicable Federal, state, and local laws and regulations," 40 C.F.R. § 761.50(a)(6).

EPA is requesting that a brief summary of the completed cleanup activities, including but not limited to: confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; copies of manifests; copies of certificates of disposal or similar certifications issued by the disposer; and total amounts of PCB waste disposed, be submitted within forty-five (45) days of completion to:

U.S. Environmental Protection Agency  
Region III  
Kelly Bunker, PCB Coordinator  
Toxics Programs Branch (3LC41)  
Land and Chemicals Division  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

Any questions concerning this approval should be directed to Ms. Kelly Bunker, at [bunker.kelly@epa.gov](mailto:bunker.kelly@epa.gov) or by phone at (215) 814-2177.

Sincerely,



Catherine A. Libertz, Acting Director  
Land and Chemicals Division

cc: M. Thomas Mellott, PADEP